

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	called 'nigger', discrimination based upon race; racial tensions and verbal abuse. (MSJ 12 AISD 0010-12)			
P-4	Oct. 17, 2017; emails between Pamela Parker, Shelby Fisher (now Stephens), Susan Leos and Amber Dickinson about farm concerns - about barn student and animal safety at the barn; racial slurs. (AISD 0030-0041)			
P-5	Oct. 19, 2017; emails from Parks to Robinson "concerned about more than just what happens at the farm" (MSJ 42; AISD 0057)			
P-6	Oct. 20, 2017; email from Parks to Robinson discussing racism. (MSJ 42; AISD 0056)			
P-7	Oct. 31, 2017 at 10:30 am; emails between Pamela Parks and Dr. Shapiro noting mother is the only African American mother in the FFA Board, and Camron is the only black student in FFA; incident where someone took a white feed bag and hung it from a noose. (AISD 0076-77)			
P-8	Dec. 7, 2017; Email from Robinson to McGraw, Leos and Dickinson noting concern from Caron Sneed & Pamela Parks that Gamblin "always makes a lot of racial slurs and using the "n-word". They are getting away with it so it continues. You can hear him say it from a distance. He talks like that often. Mother is concerned about a racially charged situation. (AISD 0443)			
P-9	Dec. 7, 2017 @7:38 pm; emails to and from Nate Robinson, Dickinson, McGraw, Leos about "Incident Regarding Racial Slurs". (MSJ 22; AISD 0445)			
P-10	Dec. 7, 2017; phone call from Pamela Parks regarding Will Gamblin's language: "mouth has gotten really bad" 9he said noodle nigger) (MSJ 36; AISD 0091)			
P-11	Dec. 11, 2017; emails between McGraw, Robinson and Leos regarding Gamblin using the _n word"; admits he uses it with friends in FFA. McGraw states she was meeting with			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	Gamblin.			
P-12	Dec. 12, 2017; emails regarding “racial slurs” to and from Parks & Robinson regarding targets or victims of racism. (MSJ 23; AISD 0088-89)			
P-13	Dec. 12, 2017; school tracking record for William Gamblin by Stephanie McGraw (campus administrator) noted meeting with Gamblin and his parents about the “n-word”; threatened consequences. (MSJ 22; AISD 0980)			
P-14	Dec. 12, 2017 Service Tracking Record for William Gamblin (Def. MSJ Exh. 22);			
P-15	Dec. 2017, Emails (McGraw/Robinson) Regarding “Racial Slurs” (Def. MSJ Exh. 23);			
P-16	2017/2018 Bowie HS Barn Rules, Ms. Fisher and Dickinson (Def. MSJ Exh. 24);			
P-17	May 9, 2018 Letter To FFA Parents from D. Shapiro (Def. MSJ Exh. 25);			
P-18	April 5, 2018; emails between Parks and Hendrix regarding “hurtful and frightening interactions”. (MSJ 27; AISD 0177)			
P-19	April 10, 2018 FFA Alumni Board Meeting (Def. MSJ Exh. 26).			
P-20	April 11, 2018 emails from Parks to Palacios regarding following chain of command for two years, The AG teachers, Susan Leos, Dr. Shapiro, Mark Robinson, in 2017 Traci Hendrix (recently) wanting to talk to Cruz about incident her family has gone through. For over 2 years she was advised by all noted not to talk to Dr. Cruz (who is the Title VI Coordinator). (MSJ 28; AISD 0004)			
P-21	April 12, 2018; email from Parks to Hendrix discussing “racial tension” and continuous discriminatory language; requesting a meeting with Dr. Cruz. (MSJ 27; AISD 0174-0175)			
P-22	April 17, 2018; email from Parks to Palacios requesting			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	meeting with Dr. Cruz (MSJ 28; AISD 0002)			
P-23	Spring 2018 emails (Reeves, Hendrix, Robinson) “cultural awareness” (AISD 464-465) (Def. MSJ Exh. 27);			
P-24	April 2018, Emails From Mrs. Parks-Sneed To Dr. Cruz (racial bullying) (Def. MSJ Exh. 28);			
P-25	April 2018, Emails from Jacob Reach Re: Meeting (Def. MSJ Exh. 29);			
P-26	April 2018, Emails To/From Robinson re: FFA conduct at banquet (Def. MSJ Exh. 30);			
P-27	April 2018 emails with Rosa Palacios (AISD Exec. Asst. to Dr. Cruz) (Sneed 133-141)			
P-28	May 2018 emails with Jacob Reach (AISD) (Sneed 206)			
P-29	May 2018 emails to Mr. Robinson (Sneed 230-231)			
P-30	May 2018 emails with Rosa Palacios, Dr. Shapiro, Mark Robinson (Sneed 327-242)			
P-31	May 2018 emails with Rosa Palacios (Sneed 286-288)			
P-32	May 14, 2018; FFA meeting; noting racial epithets. (MSJ 31; AISD 0215-0217)			
P-33	May 18, 2018; emails between Parks, Robinson and Shapiro noting experience of bullying and racism with which I have had the misfortune of witnessing personally.” (MSJ 30; AISD 0061)			
P-34	May 21, 2018; Emails to and from Parks, Robinson, Shapiro, and Charles Sneed & Camron Sneed that Camron was in the AG room and the <i>same group</i> of boys were using the “n-word” – same group of boys that were involved in racial comments to Camron; commenting boys feel comfortable enough to do this “I read all your intentions for the upcoming year, and prior to you (Robinson) becoming Principal this year (2017-18)I heard similar plans from the year before, but this year has not been better.” (MSJ 30; AISD 0059)			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P-35	May 21, 2018 Declaration of Amber Dickinson, paragraph 7. Teacher informed teacher de la Rosa that Pamela Parks had contacted Robinson that a group of students were using slurs in the FFA classroom; as a result Ms. Stephens (FFA Advisor) and she created a policy for FFA students regarding language. (Where is the policy? The evidence of the investigation?) (MSJ 17; AISD 0442)			
P-36	May 22, 2018; email from Carla De La Rosa to Robinson noting she met with Camron and had her write a statement this is noteworthy because no one else had ever done this even though their own policies and procedures required a statement.(MSJ 32; AISD 0259)			
P-37	May 23, 2018 email between Charles Sneed, Principal Robinson and Dr. Shapiro discussing continuous issues of concerns of racial slurs in the AG classrooms and FFA (nigger); says "I would like to know where you are at regarding incident of racial slurs directed to Cameron in the classroom by Will Gamblin... wasn't he supposed to be punished if he did it again.... Moreover, Cameron does not feel her mother in every time she hears racial comments because it has become the norm" discusses that Cameron should not have to manage this environment the last year.(MSJ 33; AISD 0079-0082)			
P-38	May 23, 2018 email to Robinson/Shapiro (racism "norm") (AISD 0078 –82).			
P-39	May 24, 2018 at 4:32 PM emails from Robinson to Charles Sneed admitting students have been admonished for racial slurs (but see his deposition where he says none of the complaints dealt with race and require reporting to the Title 6 Coordinator (Dr. Cruz)); he also commented that the teachers are creating a master plan to identify consequences for repeated use of inappropriate language.			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	(MSJ 33; AISD 0079-80)			
P-40	May 24, 2018 at 6:12 PM; email from Charles Sneed Robinson copying wife regarding having spoken with Robinson previously that the same group of kids was making racist comments. He says he has previously gone to Leos and Trevino and that did not help last year; <u>this is the same behavior</u> ; won't be intimidated into leaving. (MSJ 33; AISD 0078-79)			
P-41	May 31, 2018; requesting no racist behavior towards Camron. (MSJ 27; AISD 0280)			
P-42	Sept. 13, 2018 – phone records; aware of incident at farm yesterday; someone draw male genitalia on her feed container and carved it into the scoop as well. (AISD 0097)			
P-43	Sept. 13, 2018 emails from Charles Sneed to Amber Dickinson and Shelby Stevens that “we have witnessed the disrespect and disregard for teachers, the farm and school for now our third year...when complaining she runs the risk of retaliation... want to be sure her property and animals are kept safe” see attachment of feed scoop inside her feed barrel with an inappropriate carving of male genitalia “We encourage Cameron not to go on the farm alone.” (MSJ 36; AISD 0085)			
P-44	Sept. 13, 2018; email from Kyle Rhorer to Robinson re trespassing incident. (MSJ 37; AISD 0287)			
P-45	Sept. 14, 2018; email from Robinson to Kylee Rhorer coping SRO and Stephens about trespass warning. (MSJ 37 AISD 0285)			
P-46	Sept. 14, 2018; email to Robinson from Kylee Rhorer defending herself regarding the trespass warning. (MSJ 37 AISD 0286)			
P-47	Sept. 15, 2018 Kylee Rhorer seen at farm. (MSJ 35; AISD 0227)			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P-48	Sept. 15, 2018 Kylee Rhorer at farm, commenting on pictures. (This incident caused missed educational opportunities as it caused her to pull out of upcoming competition) (MSJ 35; AISD 0234)			
P-49	Sept. 21, 2018; Instagram message from Robinson on September 13, 2018 giving Kylee Rhorer a criminal trespass warning from "your nigger loving ass".) MSJ 35; AISD 0230-231)			
P-50	Sept. 21, 2018; pictures of injured pigs. (MSJ 35; AISD 0230-231)			
P-51	October 2018 emails re: Yasmin Wagner (AISD Board of Trustees) (AISD 021-24)			
P-52	Oct. 17, 2018 @ 5:05 pm; email from Yasmin Wagner to Paul Cruz regarding email from Paul Parks.			
P-53	Oct. 17, 2018 at 7:36 pm; email from Dr. Cruz to Dr. Shapiro, Jacob Roach, and M. Cavazos asking for an update (AISD 0437, 0441).			
P-54	Oct. 18, 2018; email from Robinson to Leos, Gilman about email from Dr. Shapiro asking for bulleted list with a detailed response to actions taken. As you can see the complaint goes back years. (AISD 436); AISD October Response to Parks Complaint (AISD 0292-0305).			
P-55	Dec. 07, 2018 Declaration of A Dickinson, noting she received a call from Pamela Parks who reported Gamblin used the word "nigger"; disciplinary meeting held with Gamblin's parents, yet later that same day Gamblin was on the farm and another student yelled out the "n-word". (MSJ 17, paragraphs 5&6)			
P-56	Jan. 20, 2019; email between Robinson, Officer Kirkov and Steve Melton and Shapiro regarding complaint about "years of harassing behaviors", that three students showed up at TC4S Auction with camouflage gear and excessive			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	face paint. (AISD 0063-64)			
P-57	Jan. 28, 2019; Phone call from Charles Sneed regarding the boys at the auction in camouflage and face paint that were intimidating Camron and made comments about leaving Bowie; Pamela Parks also called. (AISD 0102-107)			
P-58	Oct. 10, 2019; email from Pamela Parks to Dickinson, Robinson; Charles Sneed is cc'd; FFA officer Ashton that a fellow officer, Hannah, who were harassing Camron at a meeting regarding the pending litigation and that, essentially it was their belief that Camron was "making a big deal out of nothing".			
P-59	Sass-quatch Award (Def. MSJ Ex. 13);			
P-60	DWQ Better Path Counseling and Consulting, PLLC (treatment records) (redacted)			
P-61	DWQ Better Path Counseling and Consulting, PLLC (billing records)(redacted)			
P-62	DWQ Glasshouse Effect Psychotherapy (treatment records)(redacted)			
P-63	DWQ Glasshouse Effect Psychotherapy (billing records)(redacted)			
P-64	School Board Policy FFH (REGULATION) FREEDOM FROM DISCRIMINATION, HARASSMENT AND POLICY (D MSJ Ex. 8, Pl. Ex. D);			
P-65	School Board Policy FFH (LEGAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. B);			
P-66	School Board Policy FFH (LOCAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. C);			
P-67	School Board Policy FFH (EXHIBIT); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. E);			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P-68	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office of Civil Rights</i> (July 25, 2000).			
P-69	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office Of Civil Rights</i> (October 26, 2010);			
P-70	Clarifying Letter from US Department of Education (October 26, 2010);			
P-71	Guiding Principles- <i>A Resource Guide For Improving School Climate And Discipline</i> , U.S. Department of Education, January 2014;			
P-72	Department of Education, <i>Racial Incidents and Harassment Against Students at Educational Institutions</i> , 59 Fed. Reg. 11448 (1994).			
P-73	Guidelines On Bullying, Texas Association Of School Boards (2008);			
P-74	Guidelines On Bullying, Texas Association Of School Boards (2012);			
	II. PLAINTIFF MAY OFFER			
P-75	Dr. Craig Shapiro Deposition (D MSJ Ex. 6);			
P-76	Dr. Cruz Deposition (Pl. Supp., Exh. 1);			
P-77	Camryn Sneed Deposition (D MSJ Ex. 1);			
P-78	Charles Sneed Deposition (D MSJ Ex. 2);			
P-79	Pamela-Parker Sneed Deposition (D MSJ Ex. 3);			
P-80	Mark Robinson Deposition (D MSJ Ex. 4);			
P-81	Susan Leos Deposition (D MSJ Ex. 5);			
P-82	Mark Robinson, Declaration (D MSJ Ex. 7);			
P-83	Susan Leos Declaration (D MSJ Ex. 10);			
P-84	Oct. 2017 Police Report (Def. MSJ Ex. 20);			
P-85	Officer Stephanie Kirkov, Declaration (Def. MSJ Ex. 14);			
P-86	Amber Dickinson, Declaration (Def. MSJ Ex. 17);			
P-87	Shelby Stephens, Declaration (Def. MSJ Ex. 18);			
P-88	Oct. 2017 Farm Concerns (Def. MSJ Ex. 19);			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P-89	May 4, 2018, Meeting To Discuss FFA (Def. MSJ Exh. 31);			
P-90	5/22/18 Summary of Incident (De La Rosa to Robinson) (Def. MSJ Exh. 32)			
P-91	September 15, 2018 APD Report about criminal mischief on farm (Def. MSJ Exh. 35);			
P-92	Follow Up Emails on APD Report (Def. MSJ Exh. 36);			
P-93	Emails To Kylee Rhorer on farm incident (Def. MSJ Exh. 37);			
P-94	Emails re: Kylee Rhorer on farm incident (Def. MSJ Exh. 38);			
P-95	Oct. 22, 2018 emails from Officer Kirkov on farm incidents (Def. MSJ Exh. 39);			
P-96	DWQ South Austin Medical Clinic (treatment records)			
P-97	December 2016 emails with Leos/Shapiro (Sneed 9-13)			
P-98	October 2017 emails with Robinson (Sneed 56-60)			
P-99	October 2017 emails with Leos/Shapiro (Sneed 74-77)			
P-100	April 2018 emails with Traci Hendrix (AISD CTE Coordinator) (Sneed 116-120)			
P-101	May 2018 emails with Mr. Robinson (Sneed 255-258)			
P-102	10/25/17 Meeting with Mr. Robinson (Sneed 394-396)			
P-103	List of Ag problems including "racial slurs" (Sneed 401)			
P-104	(AISD 967) – Diagram of James Bowie High School			
P-105	Camron's education file (AISD production)			
P-106	Plaintiff reserves the right to introduce any portion of documents produced in Discovery/Disclosure by the parties			

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
P- 107	Plaintiff reserves the right to introduce other exhibits for purposes of cross examination and/or impeachment.			

Respectfully submitted,

/s/ ANTHONY O'HANLON

Anthony O'Hanlon

Anthony O'Hanlon, P.C.

State Bar No. 15235520

Federal ID: 3122684

Attorney and Counselor at Law

Anthony O'Hanlon, P.C.

111 South Travis Street

Sherman, Texas 75090

(903) 892-9133 (telephone)

(903) 957-4302 (fax)

aohanlon@somlaw.net

ATTORNEY FOR PLAINTIFFS

Martin Cirkiel

CIRKIEL & ASSOCIATES, P.C.

State Bar No. 00783829

Fed. ID # 21488

1901 E. Palm Valley Blvd.

Round Rock, Texas 78664

(512) 244-6658 [Telephone]

(512) 244-6014 [Facsimile]

marty@cirkielaw.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2020, I hereby certify that a true and correct copy of the above and foregoing document has been electronically served on all counsel of record.

/s/ Anthony O'Hanlon

Anthony O'Hanlon